

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Crim. No. 18-215 (ADM/TNL)

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
v. )  
)  
BRANDON BROOKS-DAVIS, )  
)  
Defendant. )

**DEFENDANT'S  
MOTIONS IN LIMINE**

Brandon Brooks-Davis hereby makes the following Motions In Limine regarding trial of the above matter:

1. For an Order excluding any prior “bad act” evidence, if the government provides notice of its intent to do so in this case. A separate memorandum will be filed in support of this motion if the government provides notice of its intent to introduce any “other bad acts” evidence in this case.
2. For any Order excluding evidence of Mr. Brooks-Davis’s prior convictions should he exercise his right to testify.
3. For an Order precluding any witnesses from mentioning or referring to Mr. Brooks-Davis as a gang member or being affiliated with a gang.
4. For an order directing the government to disclose if they intend to call any so-called “confidential informants” as witnesses at trial, and, if so, to immediately identify them, provide all information relating to the informant’s deal, promises of leniency, arrangements with law enforcement, CI files, CI

contracts, history of payments, criminal record (arrests and convictions), and all interviews and statements relating to this case and their dealings with Mr. Brooks-Davis, and all information known by the government bearing on the informant's credibility.

5. For an order that witnesses be sequestered and directed not to discuss their testimony with one another.
6. Order law enforcement to testify in "street clothes" rather than in uniform.

Dated: April 09, 2019

Respectfully submitted

/s/ A.L. Brown

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